

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE NO: 6:20-cr-00628-TMC
	)	
REBECCA MARTINEZ, <i>et al.</i> ;	)	<b>UNOPPOSED MOTION FOR</b>
	)	<b>MODIFICATION OF BOND</b>
Defendants.	)	
	)	
_____	)	

NOW COMES the Defendant, Rebecca Martinez, by and through her undersigned Counsel, requesting a modification to her bond, pursuant to 18 U.S.C. § 3142. This Court granted Ms. Martinez a \$25,000.00 secured bond, on November 24, 2020 (ECF No. 363), which she has since posted. Her supervision has been transferred to the United States Probation Office in the United States District Court for the Southern District of Georgia. The terms of her bond restricted Ms. Martinez' travel to Georgia and South Carolina. *See id.* Ms. Martinez would request that her bond conditions be modified to include the authority of the United States Probation Office to approve travel, with her parents, to Florida, as necessary.

Specifically, at the bond hearing, Ms. Martinez' father, Louis Martinez, had a discussion with the Court regarding recurring medical treatment at the Mayo Clinic in Jacksonville, Florida, and the necessity of traveling with his family, including Ms. Martinez, for the same. It is the undersigned's recollection that the Court was amenable to those needs. Additionally, Mr. Martinez and his wife have a second daughter, also in Jacksonville, whom they would like to visit for two days, leaving Brunswick, Georgia, on December 24, 2020, and returning on December 26, 2020.

The Martinezes represented to the Court their intent to keep Ms. Martinez under their strict observation and supervision. A modification to allow the USPO to authorize such trips to Florida,

as the need appropriately arises, would allow the Martinezes to meet the obligations to watch and monitor Ms. Martinez but also to attend, periodically, to other medical and family needs.

The undersigned has consulted with both the Assistant United States Attorney and the United States Probation Office and they have indicated that they do not oppose this motion.

**CONCLUSION**

For the foregoing reasons, Ms. Martinez would respectfully request a modification to the conditions of her bond that permits the United States Probation Office to approve travel, with her parents, to Florida as necessary.

Respectfully submitted,

The Law Office of D. Josev Brewer



s/D. Josev Brewer

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December 11, 2020  
Greenville, South Carolina